

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

THE ART INSTITUTE OF PHILADELPHIA
LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 18-11535 (CTG)

(Jointly Administered)

GEORGE L. MILLER, Chapter 7 Trustee,

Plaintiff,

v.

Adv. Proc. No. 20-50627 (CTG)

TODD S. NELSON, JOHN R. McKERNAN,
SAMUEL C. COWLEY, EDWARD WEST,
MARK A. McEACHEN, FRANK JALUFKA,
J. DEVITT KRAMER, MARK NOVAD, JOHN
DANIELSON, AND MICK BEEKHUIZEN,

Re: D.I. 93, 95, 98, 101, 102

Defendants.

REQUEST FOR ORAL ARGUMENT ON MOTIONS TO DISMISS

Pursuant to Rule 7007-3 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, each of defendants Edward West, Mark A. McEachen, Frank Jalufka, J. Devitt Kramer, Mark Novad, John Danielson, and Mick Beekhuizen, by and through their respective undersigned counsel, respectfully requests oral argument on the following filed and fully-briefed motions to dismiss and requests in support thereof:

¹ Due to the large number of debtors in the above-captioned jointly-administered chapter 7 cases, a complete list of such debtors and the last four digits of their federal tax identification numbers is not provided herein. Such information can be found at footnote 1 of the FAC.

1. *Motion to Dismiss the First Amended Complaint of Defendants John Devitt Kramer and Mark Novad* [D.I. 93]
2. *Request of John Devitt Kramer and Mark Novad to Take Judicial Notice in Support of Motion to Dismiss the First Amended Complaint* [D.I. 95]
3. *Motion of Defendants West and Beekhuizen to Dismiss the First Amended Complaint* [D.I. 98]
4. *Request of Defendants West and Beekhuizen for Judicial Notice in Support of Motion to Dismiss the First Amended Complaint* [D.I. 101]
5. *Defendants Mark McEachen, Frank Jalufka, and John Danielson's (I) Motion to Dismiss First Amended Complaint, or in the Alternative, (II) Motion for a More Definite Statement, (III) Motion to Extend Answer Deadline, and (IV) Joinder to Request for Judicial Notice* [D.I. 102]

Dated: June 22, 2022

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